UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE NEW YORK TIMES COMPANY Plaintiff, -against- MICROSOFT CORPORATION, *et al.,* Defendants.	No. 1:23-cv-11195-SHS-OTW **NOTICE OF MOTION TO ADMIT COUNSEL *PRO HAC VICE***
DAILY NEWS, *et al.*, Plaintiff, -against- MICROSOFT CORPORATION, *et al.,* Defendants.	No. 1:24-cv-3285-SHS-OTW
THE CENTER FOR INVESTIGATIVE REPORTING, INC., Plaintiff, -against- OPENAI, INC., *et al.,* Defendants.	No. 1:24-cv-04872-SHS-OTW

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern District of New York, I, Daniel Jordan, hereby move this Court for an Order for admission to practice *pro hac vice* to appear as counsel for Defendants OpenAI Inc., OpenAI LP, OpenAI LLC, OpenAI GP LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation LLC, and OpenAI Holdings LLC (collectively, "OpenAI"), in the above-captioned action.

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I am a member in good standing of the Bars of California and Texas and certificates of good standing from the Supreme Courts are attached hereto as Exhibits A and B. There are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached the declaration pursuant to Local Rule 1.3.

Respectfully submitted,

Dated: February 3, 2025   LEWIS & LLEWELLYN LLP

By: /s/ *Daniel Jordan*
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